

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**IVETTE M. MARTÍNEZ GONZÁLEZ, ET
ALS.,**

Plaintiffs

v.

**CATHOLIC SCHOOLS OF THE
ARCHDIOCESES OF SAN JUAN THE
PROVISIONS OF PENSIONS PLAN, et als.**

Defendants

CIVIL No. 16-2077 (GAG)

INFORMATIVE MOTION

TO THE HONORABLE COURT:

COMES NOW the Superintendence of the Catholic Schools of the Archdioceses of San Juan (hereinafter “the Superintendence”), and the Trust of the Catholic Schools of the Archdiocese of San Juan Pension Plan without submitting to the jurisdiction of the Court and without waiving any affirmative defenses, including defective and insufficient service of process, through counsel, respectfully **STATE, ALLEGE** and **PRAY** as follows:

1. On July 31, 2017, Plaintiffs filed a Motion to Compel. See Docket No. 123.
2. In said motion, Plaintiffs indicated that they needed the Court's intervention with certain discovery disputes.
3. Plaintiffs also stated they needed to conclude discovery proceedings to file a response to the Motion to Dismiss filed on July 18, 2017.
4. It must be noted that Plaintiffs do not need to conclude any discovery proceedings to file a response to the Motion to Dismiss. All of the documents attached to the Motion to Dismiss are mentioned in Plaintiffs' First Amended Complaint and /or the Court may take

judicial notice. See Overall v. Ascension, 23 F.Supp.3d 816 (E.D. Mich. 2014).

5. Defendant will file a Response in Opposition to Plaintiffs' Motion to Compel. However, while the term allowed by the Federal Rules of Civil Procedure and the Local Civil Rules to answer said Opposition is due on August 14, 2017, Defendant informs the Court that it is currently in the process of moving to a new office location. Therefore, Defendant respectfully requests that the Court take notice of this event.

6. In order to file a Response in Opposition to Plaintiffs' Motion to Compel in light of said event, Defendant respectfully requests extension of term to answer said Opposition, by seven (7) additional days.

WHEREFORE, Defendant respectfully requests that the Court take notice of the above-mentioned event and kindly grant Defendants an extension of seven (7) days to file a Response in Opposition to Plaintiffs' Motion to Compel.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of August 2017.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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